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Co-Counsel to the WHC Liquidation Trust

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN JOSE DIVISION

JEREMY ROSENTHAL, AS LIQUIDATION
 TRUSTEE OF THE WHC LIQUIDATION
 TRUST,

Plaintiff,

v.

HALSEN HOLDINGS, LLC, a California
 limited liability company; SOUTH TEXAS
 ASSOCIATES & RESOURCES, a California
 corporation; PENINSULA HEALTHCARE
 MANAGEMENT LLC, a Nevada limited
 liability company; DANIEL BROTHMAN, an
 individual; EDITH BROTHMAN, an
 individual; STACY SEAN FOWLER, an
 individual; EDMUND C. KING, an
 individual; and DOES 1 through 100,
 inclusive,

Defendants.

Case No. 5:23-cv-06216-EKL

**DECLARATION OF PAUL S. JASPER IN
 SUPPORT OF STIPULATION TO
 CONTINUE CASE MANAGEMENT
 CONFERENCE STATEMENT
 DEADLINE**

Courtroom: 7
 Judge: Eumi K. Lee

Complaint Filed: December 1, 2023
 Trial Date: None

1 I, Paul S. Jasper, declare:

2 1. I am an attorney for Perkins Coie LLP, counsel for Plaintiff Jeremy Rosenthal, in his
3 capacity as the Liquidation Trustee of the WHC Liquidation Trust and representative of the
4 bankruptcy estates of Watsonville Hospital Corporation (“WHC”) and certain of its affiliates
5 (collectively with WHC, the “Debtors”).

6 2. On December 4, 2023, this Court entered an Initial Scheduling Order (Dkt. 5),
7 scheduling the Initial Case Management Conference (“CMC”) for March 5, 2024.

8 3. On January 18, 2024, the clerk reset the date of the CMC for March 14, 2024
9 following reassignment (Dkt. 14).

10 4. On February 5, 2024, the Court granted, as modified, the joint request by Plaintiff
11 and Defendants Halsen Holdings, LLC, South Texas Associates & Resources, Peninsula Healthcare
12 Management LLC, Daniel Brothman, Edith Brothman, Stacy Sean Fowler, and Edmund C. King
13 (“Defendants”) (collectively, the “Parties”) for extension of case management deadlines, setting the
14 CMC to May 16, 2024 (Dkt. 16).

15 5. On May 7, 2024, the clerk continued the CMC to June 13, 2024 (Dkt. 27).

16 6. On June 11, 2024, the Court granted a stipulation to continue the Case Management
17 Conference to September 5, 2024 (Dkt. 33).

18 7. On August 20, 2024, this Court reassigned this case to the Honorable Eumi K. Lee,
19 reset the deadline for the Parties to file their Joint Case Management Conference Statement from
20 August 22, 2024 to September 16, 2024, and vacated the Initial Case Management Conference
21 (“CMC”) set for September 5, 2024 (Dkt. 37);

22 8. There have been no other time modification requests in this case;

23 9. The Parties engaged in a mediation on August 28, 2024 and reached a settlement in
24 principle subject to documentation and obtaining approval of the proposed settlement by either
25 (a) the United States Bankruptcy Court for the Northern District of California (the “Bankruptcy
26 Court”) in Case No. 21-51477 (jointly administered) or (b) the Oversight Committee appointed
27 pursuant to the plan of liquidation confirmed in the Debtors’ chapter 11 bankruptcy cases; and
28

1 10. The Parties request an extension of the Joint Case Management Conference
2 Statement deadline until October 16, 2024 in order to finalize the settlement and to conserve the
3 time and resources of the Court and the Parties.

4 11. The requested time modification would not have any effect on the schedule for
5 the case because the Court: (1) vacated all pretrial conference and trial dates before December 4,
6 2024 (Dkt. 37); and (2) ordered that all pretrial conference and trial dates after December 4,
7 2024 will remain in place (Dkt. 37) and no pretrial conference or trial dates have been set after
8 December 4, 2024.

9 12. The Court has not stated that no further extensions will be granted.

10 I declare under penalty of perjury under the laws of the State of California that the
11 foregoing is true and correct, and that this Declaration was executed on September 6, 2024, in San
12 Francisco, California.

13
14 Dated: September 6, 2024

PERKINS COIE LLP

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16 By: /s/ Paul S. Jasper

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19 *Counsel to Plaintiff*
20 *Jeremy Rosenthal, as Liquidation*
21 *Trustee of the WHC Liquidation Trust*
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